



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2008 FEB 13 P 5:18

**MEMORANDUM**

February 13, 2008

**SENSITIVE**

TO: The Commission

THROUGH: Patrina M. Clark *PM*  
Staff Director

FROM: John D. Gibson *JG*,  
Chief Compliance Officer

Deborah Ruth Kant *DRK*  
Director, ADR Office

BY: Lynn M. Fraser *LMF*  
Assistant Director, ADR Office

SUBJECT: ADR 447 Peter and Magdalene Watts<sup>1</sup>, Evergreen View Ventures, Daniel Pike,  
William Geyer, Sam R. Crawford, Kent Properties, LLC, 10<sup>th</sup> & McKenzie Ltd.,  
Recommendation to Dismiss<sup>2</sup>

ADR Case: ADR 447

Source No. MUR 5946

**Respondents:**

1. Peter and Magdalene Watts
2. Evergreen View Ventures
3. Pike for Mayor
4. Citizens for Bill Geyer
5. Crawford for Council
6. Kent Properties, LLC
7. 10<sup>th</sup> & McKenzie, Ltd.

**Respondents' Reps.:**

1. Peter and Magdalene Watts
2. Peter and Magdalene Watts
3. Daniel Pike
4. William Geyer
5. Sam R. Crawford
6. Steven Shropshire, Esq.
7. Steven Shropshire, Esq.

<sup>1</sup> At the time of circulation, the case was titled "The Peter Law Group," however, for purposes of identification, the case name has been changed to Peter and Magdalene Watts.

<sup>2</sup> The Office of General Counsel concurs in the description of this matter.

28190274171

**Complainant:** Todd Donovan

**Committees Names:**  
Citizens for Bill Geyer  
Crawford for Council  
Pike For Mayor

**Date Complaint Filed:** 10/16/2007

**Committee Type:** local campaign committees

**Date Forwarded to ADRO:** 1/28/08

**District #/or State:** Washington State local elections

**Election – Won/Lost:** N/A

**Election Cycle:** November 2007

**Issues:**

- Contributions by foreign nationals 2 U.S.C. § 441e, 11 C.F.R. §§ 103.3(b), 110.20

**Summary and Analysis of Case:** The FECA prohibits foreign nationals from making contributions, donations, expenditures, independent expenditures or disbursements, directly or indirectly, in connection with a Federal, State, or local election. The Complainant alleges that candidates for local office in the Bellingham, Washington vicinity accepted contributions from foreign nationals.

Specifically, the complaint notes that Citizens for Bill Geyer (Geyer), advocating the election of William Geyer to the Bellingham City Council, accepted \$500 from Kent Properties, LLC (Kent LLC) on September 24, 2007. The complaint alleges that Kent is a business with an address in British Columbia, Canada.

The complaint goes on to allege that Crawford for Council (Crawford), advocating the re-election of Sam Crawford to the Whatcom County Council, accepted \$300 from Peter and Magdalene Watts, Canadian citizens. The complaint also alleges that Crawford accepted \$300 from Evergreen View Ventures (Evergreen), believed to be a Canadian company owned by Peter and Magdalene Watts.

The complaint also alleges that Pike for Mayor (Pike), advocating the election of Daniel Pike as Mayor of Bellingham, Washington, accepted a contribution in the amount of \$500 from the 10<sup>th</sup> and McKenzie Ltd. Partnership (McKenzie) on September 26, 2007. The complaint asserts that McKenzie is a Canadian partnership.

**RECOMMENDATION:**

1. Dismiss ADR 447 (MUR 5946), and close the file.
2. Approve the appropriate letters.